

*United States District Court*



## *Central District of California*

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*ACTIVISION PUBLISHING, INC., Plaintiff, v.*

*RYAN J. ROTHOLZ, Defendant.*

*Case No. 2:25-cv-04075-SPG-BFM*

### ***NOTICE OF ERRATA***

#### **I. INTRODUCTION**

Defendant respectfully submits this notice to correct a clerical duplication in his “Reply to Plaintiff’s Opposition to Motion to Dismiss” filed on October 22, 2025. Section III (“Plaintiff’s Factual Allegations Remain Conclusory”) inadvertently duplicated the text of the Introduction. Defendant requests that the Court consider the following corrected Section III:

### III. PLAINTIFF’S FACTUAL ALLEGATIONS REMAIN CONCLUSORY

Plaintiff’s Opposition relies on broad, generalized claims rather than specific, factual assertions tying Defendant’s alleged conduct to California. Assertions that “Defendant developed and distributed software” or that “Plaintiff’s developers are based in California” are conclusory under *Ashcroft v. Iqbal*, 556 U.S. 662 (2009). The Opposition identifies no concrete transactions, contracts, or communications involving California residents. Without non-conclusory factual allegations establishing purposeful direction toward this forum, Plaintiff fails to satisfy the plausibility requirement of Rule 12(b)(6).

### II. CONCLUSION

Defendant respectfully apologizes to the Court and opposing counsel for this inadvertent clerical duplication and appreciates the Court’s understanding. The duplication was purely unintentional and does not alter the substance or intent of the original filing.

Respectfully submitted,  
Dated: October 23, 2025  
/s/ Ryan J. Rothholz  
Ryan J. Rothholz  
Defendant, Pro Se  
Nashville, TN